

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

BRIMA WURIE,

Defendant.

**08 CR 1007.1 RGS**

) Criminal No.

) VIOLATIONS:

) 18 U.S.C. § 922 (g)(1)  
) Felon in Possession of  
) Firearm and Ammunition

) 21 U.S.C. § 841 (a)(1)  
) Distribution of Cocaine  
) Base/Distribution of  
) Cocaine Base Within 1000  
) Feet of a School

) 21 U.S.C. § 841 (a)(1)  
) Possession of Cocaine  
) Base with Intent to  
) Distribute

) 18 U.S.C. § 924(d)  
) 21 U.S.C. § 853  
) Criminal Forfeiture  
) Allegation

INDICTMENT

COUNT ONE: (18 U.S.C. § 922(g)(1)-- Felon in Possession of  
Firearm and Ammunition)

The Grand Jury charges that:

On September 5, 2007 in Suffolk County and in the District  
of Massachusetts,

BRIMA WURIE,

defendant herein, having previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a Smith & Wesson 9 mm pistol, model # SW9VE, bearing serial number PBP7108; five (5) rounds of Luger 9mm ammunition; and six (6) rounds of Smith & Wesson .40 caliber ammunition.

All in violation of Title 18, United States Code, Section 922 (g) (1).

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base/Distribution of Cocaine Base Within 1000 Feet of a School)

The Grand Jury charges that:

On September 5, 2007 in Suffolk County and in the District of Massachusetts,

**BRIMA WURIE,**

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base, a Schedule II controlled substance.

The Grand Jury further alleges that the offense described herein involved at least 5 grams of a mixture or substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii).

The Grand Jury further alleges that the offense described herein was committed by the Defendant within one thousand feet of the real property comprising a school, more particularly, the St. Mary's Elementary School in Boston, Massachusetts, in violation of Title 21, United States Code, Section 860.

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE:** (21 U.S.C. § 841(a)(1) -- Possession with Intent to Distribute Cocaine Base)

The Grand Jury charges that:

On September 5, 2007 in Suffolk County and in the District of Massachusetts,

**BRIMA WURIE,**

the defendant herein, did knowingly and intentionally possess a quantity of cocaine base, a Schedule II controlled substance, with the intent to distribute.

The Grand Jury further alleges that the offense described herein involved at least 50 grams of a mixture or substance containing a detectable amount of cocaine base, also known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(i-i).

All in violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE ALLEGATION**

**(18 U.S.C. § 924(d), 21 U.S.C. § 853)**

The Grand Jury further charges that:

1. Upon conviction of the offenses alleged in Counts 1, 2 and 3 of this Indictment,

**BRIMA WURIE,**

defendant herein, shall forfeit to the United States the firearm and ammunition involved in the commission of the offense, any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violation, including but not limited to the following:

- (a) Smith & Wesson 9 mm pistol, model # SW9VE, bearing serial number PBP7108;
- (b) five (5) rounds of Luger 9 mm ammunition; and
- (c) six (6) rounds of Smith & Wesson .40 caliber ammunition.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant--

- (a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

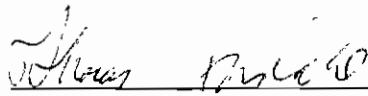
(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

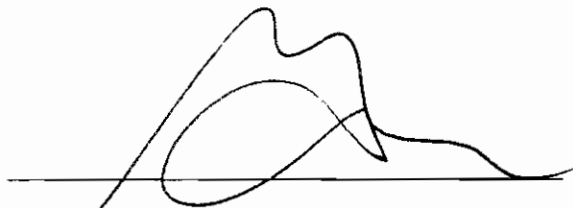
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of Title 18, United States Code, Section 924(d) and Title 21, United States Code, Section 853.

A TRUE BILL,



FOREPERSON OF THE GRAND JURY



GRETCHEN LUNDGREN

SPECIAL ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS

March 27, 2008

Returned into the District Court by the Grand Jurors and  
filed.



Deputy Clerk

3/27/08  
C 4:18